DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems and	)	MM Docket No. 87-268
Their Impact upon the Existing	)	
Television Broadcast Service	)	

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION BY CALIFORNIA OREGON BROADCASTING, INC.

California Oregon Broadcasting, Inc. (COBI), by its attorneys, hereby supplements its pending petition for reconsideration of the Sixth Report and Order in this proceeding..[1]

A. Background

COBI is the licensee of full-service television stations KOTI-TV, Klamath Falls, OR, KOBI-TV, Medford OR, and KLSR-TV, Eugene, OR. On June 13, 1997, COBI filed a Petition for Reconsideration ("Petition") which requested changes in the Digital Television (DTV) pairings for the NTSC operations of KOTI, KOBI and KLSR. As noted in the Petition (at 4), pending the release of

---

1 Sixth Report and Order, MM Docket No. 87-268, FCC 97-115, (rel. April 21, 1997).

No. of Copies rec'd 0+9
List ABCDE

OET Bulletin No. 69, COBI and others lacked the complete technical parameters to create optimum DTV channel pairings and to replicate NTSC service areas.

The Petition suggested, nevertheless, the need to pair KOTI and KOBI with VHF DTV channels. In particular, the Petition noted that DTV channel 11 might prove an effective alternative to the allotted channel 40 in Klamath Falls, while channel 7 might be a suitable alternative for allotted channel 15 in Medford. These changes could address the very limited (79.6%) service area replication of KOTI's NTSC channel 2, and the inadequate (86.2%) proposed replication of KOBI's NTSC channel 5 service area.

The Petition also addressed station KLSR's DTV channel 26 in terms of potential interference from adjacent DTV channel 25 in Eugene, OR, noting striking disparities in the stations' power levels and antenna height above average terrain -- channel 25 would have 5 times the power of KLSR and operate at a 600-foot antenna height advantage above average terrain. COBI urged that a new channel had to be found for KLSR and cited DTV channel 31 as a feasible substitute (Petition at 5).

B. <u>Supplemental Information - OET Bulletin No. 69</u>

OET Bulletin No. 69 has been released, and it reflects technical parameters which form the basis for supplementing and better documenting COBI's Petition.

Attached is an Engineering Statement prepared by COBI's consultant, Lohnes & Culver. It provides supplemental material based on OET Bulletin No. 69,

addressing the issue of COBI's DTV channel pairings with the benefit of the FCC's newly-released technical data.

Lohnes & Culver's study demonstrates that the use of DTV channel 13 for Klamath Falls, OR, in lieu of allotted channel 40, would be superior to channel 11, based on OET Bulletin No. 69 parameters. Substitution of DTV channel 13 for allotted channel 40 would improve service area coverage to 88.4%, compared to 79.6% as now allotted. There would essentially be no impact on channel 13 NTSC operations or on ATV interference estimates.

The study further evidences that use of DTV channel 7 in Medford would improve replication of the station's NTSC channel 5 service area to 92.6%, without materially impacting channel 7 operators in other cities.

For KLSR, Lohnes & Culver also has further studied DTV channel 31 (in lieu of channel 26) pairing with NTSC channel 34. Their calculations reflect an improvement (96.8% to 100%) in service area when Channel 31 is substituted for channel 26; no impact on population or area of NTSC stations or DTV pairings is effected by that change.

C. Conclusion

The consequences of Lohnes & Culver's application of OET Bulletin No. 69 parameters to COBI's very extreme DTV allotment problems are important. The improved NTSC/ATV match is striking in percentage terms in all three COBI markets, and any impact on NTSC operators or DTV pairings is minimal or non-existent. Significantly, both KOTI in Klamath Falls and KOBI in Medford would be

able to continue service on the VHF band as needed to avoid potentially calamitous impacts on their DTV coverage, arising from the severe affects of the rugged terrain on UHF transmission paths.

COBI respectfully requests, therefore, that the Commission reconsider the DTV pairings for KOTI, KOBI and KLSR to substitute the DTV pairings described in the attached Lohnes & Culver study.

Respectfully submitted,

CALIFORNIA OREGON BROADCASTING, INC.

By: 
Peter D. O'Connell

REED SMITH SHAW & McCLAY
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005
(202) 414-9223

Its Attorneys

August 22, 1997

EXHIBIT E-S
SUPPLEMENTAL ENGINEERING DATA
RE: PETITION FOR RECONSIDERATION
OF THE SIXTH REPORT AND ORDER
IN MM DOCKET NO. 87-268

INDEX

Prepared by
Lohnes and Culver Washington, D.C.
August, 1997

EXHIBIT E-S
SUPPLEMENTAL ENGINEERING DATA
RE: PETITION FOR RECONSIDERATION OF
THE SIXTH REPORT AND ORDER
IN MM DOCKET NO. 87-268

INTRODUCTION

This statement was prepared on behalf of California Oregon Broadcasting, Inc. ("COBI"), licensee of television broadcast station KOBI Medford, OR, KOTI Klamath Falls, OR and KLSR Eugene, OR. COBI has a petition for reconsideration of the Sixth Report and Order in Docket No. 87-268 pending before the Commission. The Petition requests changes in the DTV pairings with the NTSC operations of KOTI, KOBI, and KLSR. The proposed changes were made prior to the release of OET Bulletin No. 69, that contains the technical parameters employed by the Commission in establishing the DTV Allotment Table. This exhibit provides supplemental engineering information in support of COBI's petition for reconsideration. The calculations contained in this Exhibit are based on the technical parameters described in OET Bulletin No. 69.

DTV PAIRINGS

KOBI and KOTI are licensed to operate on NTSC Channels 5 and 2 respectively. Appendix B of the Sixth Report and Order paired KOBI with DTV Channel 15 and KOTI with DTV Channel 40. COBI's petition for reconsideration describes the absolute necessity of maintaining the operations of KOBI and KOTI in the VHF band and suggests the pairing of DTV Channel 7 for KOBI and DTV Channel 11 for KOTI. Those recommendations were made without the benefit of the technical parameters outlined in OET Bulletin No. 69.

The office of Lohnes and Culver with the cooperation of the Commission's Office of Engineering and Technology and OET Bulletin No. 69 has established the computer

capability to conduct analyses of DTV pairings with authorized NTSC operations. The accuracy of the computer software has been confirmed by comparing the resulting output with service replication and interference evaluations contained in Appendix B of the Sixth Report and Order.

KOTI DTV PAIRING

Figures 1 and 2 attached to this statement supply the results of an analysis of pairing DTV Channel 13 with NTSC Channel 2 at KOTI in Klamath Falls, in lieu of the Channel 40 pairing in the Sixth Report. Channel 11 was proposed in COBI's Petition for Reconsideration but Channel 13 is a better alternative based on the technical parameters described in OET Bulletin No. 69. As shown on Figure 1 the ATV/NTSC percent match improves from 54.5 to 65.8 in population and from 79.6 to 88.4 in area when KOTI is paired with DTV Channel 13 rather than Channel 40.

Figure 2 provides the results of an analysis of the NTSC stations and the DTV allotments that are affected by the proposed pairing of DTV Channel 13 with KOTI at Klamath Falls. The proposed change in the DTV pairing for KOTI (Channel 40 to Channel 13) has essentially no impact on the Channel 13 NTSC operations at Eureka, CA, Eugene, OR, La Grande, OR and the Channel 12 NTSC operation at Medford, OR. No additional population is affected by ATV interference from the proposed pairing of Channel 13 with KOTI and the additional land area affected is less than one percent in all cases.

KOBI DTV PAIRING

Figures 3 and 4 attached to this statement supply the results of an analysis of pairing DTV Channel 7 with NTSC Channel 5 at KOBI in Medford, OR in lieu of the Channel 15 pairing in the Sixth Report. As shown on Figure 3 the ATV/NTSC percent

match improves from 93.3 to 97.3 in population and from 86.2 to 92.6 in area when KOBI is paired with Channel 7 rather than Channel 15.

Figure 4 provides the results of an analysis of the NTSC stations and the DTV allotments that are affected by the proposed pairing of DTV Channel 7 with KOBI at Medford, OR. The proposed change in the DTV pairing for KOBI (Channel 15 to Channel 7) has essentially no impact on the NTSC operations on Channel 7 at Redding, CA and Channel 8 at Medford, OR. In both cases the additional population affected by ATV interference is less than one percent of the population within the noise limited contour that is not affected by terrain losses. The proposed change does have a relatively minor impact on the NTSC Channel 7 operation at Corvallis, OR resulting in an additional loss in population of approximately two percent of the total within the noise limited contour that is not affected by terrain losses.

KLSR DTV PAIRING

For KLSR COBI's petition for reconsideration proposed a change in the DTV pairing with the NTSC operation of Channel 34 at Eugene, OR. It was suggested that DTV Channel 31 be paired with NTSC Channel 34 at KLSR in lieu of the Channel 26 pairing shown in the Sixth Report and Order. The pairing of Channel 31 rather than Channel 26 will eliminate the potential for interference between the ATV operation of KLSR on Channel 26 and the ATV operation of KVAL-TV in Eugene, OR on Channel 25 as proposed in the Sixth Report and Order.

Figures 5 and 6 attached to this statement provide the results of an analysis of pairing DTV Channel 31 with NTSC Channel 34 at KLSR in Eugene, OR in lieu of the Channel 26 pairing in the Sixth Report. As shown on Figure 5 the ATV/NTSC percent match improves from 98.1 to 100 in population and from 96.8 to 100 in area when KLSR is paired with DTV Channel 31 rather than Channel 26.

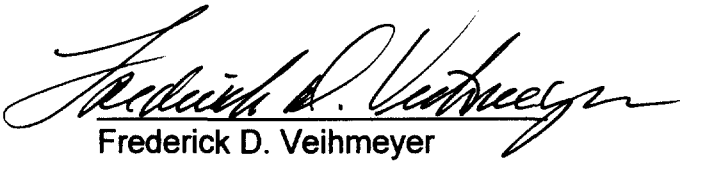
Figure 6 provides the results of an analysis of the NTSC stations and the DTV allotments that are affected by the proposed pairing of DTV Channel 31 with KLSR at Eugene, OR. The proposed change in the DTV pairing for KLSR (Channel 26 to Channel 31) as no impact on population or area within the noise limited contour of any NTSC operation or any DTV pairing shown in the Sixth Report.

CONCLUSION

The changes in DTV pairings for KOBI, KOTI and KLSR proposed herein improve the ATV/NTSC percent match in all three cases and have a very minimal impact on any NTSC operation or DTV allotment. In the case of KOBI, Medford, and KOTI Klamath Falls, the proposed change in DTV pairing will enable the station's to continue operation in the VHF band that is critical to both stations ability to provide quality service to their respective markets. As described in COBI's pending petition for reconsideration the nature of the Medford - Klamath Falls area is such that a change from VHF to UHF transmission will significantly degrade the service in those markets.

Accordingly, we urge the Commission to reconsider the DTV pairings for KOBI Medford, KOTI Klamath Falls and KLSR Eugene and substitute the DTV pairings proposed herein.

Respectfully submitted,
LOHNES AND CULVER



Frederick D. Veihmeyer

August, 1997

FIGURE 1
COMPARISON OF DTV PAIRINGS
KOTI WITH DTV CH. 40
KOTI WITH DTV CH. 13

SIXTH REPORT

Analysis of: 2N OR KLAMATH FALLS

	POPULATION	AREA (sq km)
within Noise Limited Contour	259367	52658.8
not affected by terrain losses	162768	45371.1
lost to NTSC IX	4238	848.4
lost to additional IX by ATV	0	0.0
lost to all IX	4238	848.4

Analysis of: 40A OR KLAMATH FALLS
HAAT 671.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 6.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	259367	52658.8
not affected by terrain losses	86443	35786.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	54.5	79.6

==========

PROPOSED

Analysis of: 2N OR KLAMATH FALLS

	POPULATION	AREA (sq km)
within Noise Limited Contour	259367	52658.8
not affected by terrain losses	162768	45371.1
lost to NTSC IX	4238	848.4
lost to additional IX by ATV	0	0.0
lost to all IX	4238	848.4

Analysis of: 13A OR KLAMATH FALLS
HAAT 671.0 m, ATV ERP 43.3 kW, direction 180.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	259367	52658.8
not affected by terrain losses	104693	39932.3
lost to NTSC IX	364	148.1
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	364	148.1
percent match ATV/NTSC	65.8	88.4

==========

FIGURE 2
ANALYSIS OF NTSC/ATV STATIONS
AFFECTED BY CHANNEL 13 DTV PAIRING FOR KOTI

KOTI PAIRED WITH CH. 13 (PROPOSED)

Analysis of: 13N CA EUREKA

	POPULATION	AREA (sq km)
within Noise Limited Contour	130989	35996.6
not affected by terrain losses	119945	28662.5
lost to NTSC IX	0	12.1
lost to additional IX by ATV	0	72.7
lost to all IX	0	84.8

Analysis of: 11A CA EUREKA
HAAT 515.0 m, ATV ERP 13.6 kW, direction 270.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	130989	35996.6
not affected by terrain losses	121098	30373.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 13N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	549683	25974.3
lost to NTSC IX	30436	893.5
lost to additional IX by ATV	0	124.2
lost to all IX	30436	1017.7

Analysis of: 25A OR EUGENE
HAAT 451.0 m, ATV ERP 602.7 kW, direction 0.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	663365	27945.6
lost to NTSC IX	0	4.0
lost to additional IX by ATV	298	52.1
lost to ATV IX only	298	52.1
lost to all IX	298	56.1
percent match ATV/NTSC	100.0	99.9

==========

Analysis of: 13N OR LA GRANDE

	POPULATION	AREA (sq km)
within Noise Limited Contour	76268	22247.8
not affected by terrain losses	39140	14541.7
lost to NTSC IX	0	24.1
lost to additional IX by ATV	0	0.0
lost to all IX	0	24.1

Analysis of: 5A OR LA GRANDE
HAAT 787.0 m, ATV ERP 1.0 kW, direction 336.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	76268	22247.8
not affected by terrain losses	75640	21361.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 12N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	414064	47285.5
not affected by terrain losses	318736	32529.3
lost to NTSC IX	4817	1194.0
lost to additional IX by ATV	10	76.1
lost to all IX	4827	1270.1

Analysis of: 38A OR MEDFORD
HAAT 823.0 m, ATV ERP 488.1 kW, direction 70.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	414064	47285.5
not affected by terrain losses	309983	32617.4
lost to NTSC IX	57	20.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	57	20.0
percent match ATV/NTSC	96.4	98.7

KOTI PAIRED WITH CH. 40 (SIXTH REPORT)

Analysis of: 13N CA EUREKA

	POPULATION	AREA (sq km)
within Noise Limited Contour	130989	35996.6
not affected by terrain losses	119945	28662.5
lost to NTSC IX	0	12.1
lost to additional IX by ATV	0	0.0
lost to all IX	0	12.1

Analysis of: 11A CA EUREKA
HAAT 515.0 m, ATV ERP 13.6 kW, direction 270.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	130989	35996.6
not affected by terrain losses	121098	30373.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 13N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	549683	25974.3
lost to NTSC IX	30436	893.5
lost to additional IX by ATV	0	0.0
lost to all IX	30436	893.5

Analysis of: 25A OR EUGENE
HAAT 451.0 m, ATV ERP 602.7 kW, direction 0.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	663365	27945.6
lost to NTSC IX	0	4.0
lost to additional IX by ATV	298	52.1
lost to ATV IX only	298	52.1
lost to all IX	298	56.1
percent match ATV/NTSC	100.0	99.9

==========

Analysis of: 13N OR LA GRANDE

	POPULATION	AREA (sq km)
within Noise Limited Contour	76268	22247.8
not affected by terrain losses	39140	14541.7
lost to NTSC IX	0	24.1
lost to additional IX by ATV	0	0.0
lost to all IX	0	24.1

Analysis of: 5A OR LA GRANDE
HAAT 787.0 m, ATV ERP 1.0 kW, direction 336.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	76268	22247.8
not affected by terrain losses	75640	21361.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 12N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	414064	47285.5
not affected by terrain losses	318736	32529.3
lost to NTSC IX	4817	1194.0
lost to additional IX by ATV	0	0.0
lost to all IX	4817	1194.0

Analysis of: 38A OR MEDFORD
HAAT 823.0 m, ATV ERP 488.1 kW, direction 70.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	414064	47285.5
not affected by terrain losses	309983	32617.4
lost to NTSC IX	57	20.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	57	20.0
percent match ATV/NTSC	96.4	98.7

FIGURE 3
COMPARISON OF DTV PAIRINGS
KOBI WITH DTV CH. 15
KOBI WITH DTV CH. 7

SIXTH REPORT

Analysis of: 5N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	456310	53622.0
not affected by terrain losses	370164	44968.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 15A OR MEDFORD
HAAT 823.0 m, ATV ERP 635.9 kW, direction 28.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	456310	53622.0
not affected by terrain losses	346956	38847.4
lost to NTSC IX	882	44.1
lost to additional IX by ATV	287	24.0
lost to ATV IX only	1169	68.1
lost to all IX	1169	68.1
percent match ATV/NTSC	93.3	86.2

==========

PROPOSED

Analysis of: 5N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	456310	53622.0
not affected by terrain losses	370164	44968.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 7A OR MEDFORD
HAAT 823.0 m, ATV ERP 33.3 kW, direction 343.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	456310	53622.0
not affected by terrain losses	363010	42172.5
lost to NTSC IX	2172	524.8
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	2172	524.8
percent match ATV/NTSC	97.3	92.6

FIGURE 4
ANALYSIS OF NTSC/ATV STATIONS AFFECTED BY CHANNEL 7 DTV PAIRING FOR KOBI

KOBI PAIRED WITH CH. 7 (PROPOSED)

Analysis of: 7N CA REDDING

	POPULATION	AREA (sq km)
within Noise Limited Contour	373778	47717.0
not affected by terrain losses	326552	35609.8
lost to NTSC IX	5474	411.8
lost to additional IX by ATV	70	355.9
lost to all IX	5544	767.7

Analysis of: 14A CA REDDING
HAAT 1103.0 m, ATV ERP 159.1 kW, direction 225.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	373778	47717.0
not affected by terrain losses	326805	35733.8
lost to NTSC IX	0	16.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	16.0
percent match ATV/NTSC	99.8	99.4

==========

Analysis of: 7N OR CORVALLIS

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1031912	25050.1
lost to NTSC IX	183436	1352.4
lost to additional IX by ATV	24122	1480.9
lost to all IX	207558	2833.3

Analysis of: 39A OR CORVALLIS
HAAT 375.0 m, ATV ERP 1000.0 kW, Cap Adj 1.3 dB 270.0 deg T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1078464	25130.3
lost to NTSC IX	6	8.0
lost to additional IX by ATV	111698	240.8
lost to ATV IX only	111698	240.8
lost to all IX	111704	248.8
percent match ATV/NTSC	99.6	97.8

==========

Analysis of: 8N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	413490	47141.1
not affected by terrain losses	325312	33358.6
lost to NTSC IX	2884	548.9
lost to additional IX by ATV	207	80.1
lost to all IX	3091	629.0

Analysis of: 42A OR MEDFORD
HAAT 818.0 m, ATV ERP 526.8 kW, direction 71.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	413490	47141.1
not affected by terrain losses	310311	32356.9
lost to NTSC IX	1751	208.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1751	208.3
percent match ATV/NTSC	94.6	95.9

KOBI PAIRED WITH CH. 15 (SIXTH REPORT)

Analysis of: 7N CA REDDING

	POPULATION	AREA (sq km)
within Noise Limited Contour	373778	47717.0
not affected by terrain losses	326552	35609.8
lost to NTSC IX	5474	411.8
lost to additional IX by ATV	0	0.0
lost to all IX	5474	411.8

Analysis of: 14A CA REDDING
HAAT 1103.0 m, ATV ERP 159.1 kW, direction 225.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	373778	47717.0
not affected by terrain losses	326805	35733.8
lost to NTSC IX	0	16.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	16.0
percent match ATV/NTSC	99.8	99.4

==========

Analysis of: 7N OR CORVALLIS

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1031912	25050.1
lost to NTSC IX	183436	1352.4
lost to additional IX by ATV	0	0.0
lost to all IX	183436	1352.4

Analysis of: 39A OR CORVALLIS
HAAT 375.0 m, ATV ERP 1000.0 kW, Cap Adj 1.3 dB 270.0 deg T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1078464	25130.3
lost to NTSC IX	6	8.0
lost to additional IX by ATV	111698	240.8
lost to ATV IX only	111698	240.8
lost to all IX	111704	248.8
percent match ATV/NTSC	99.6	97.8

==========

Analysis of: 8N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	413490	47141.1
not affected by terrain losses	325312	33358.6
lost to NTSC IX	2884	548.9
lost to additional IX by ATV	0	0.0
lost to all IX	2884	548.9

Analysis of: 42A OR MEDFORD
HAAT 818.0 m, ATV ERP 526.8 kW, direction 71.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	413490	47141.1
not affected by terrain losses	310311	32356.9
lost to NTSC IX	1751	208.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1751	208.3
percent match ATV/NTSC	94.6	95.9

FIGURE 5
COMPARISON OF DTV PAIRINGS
KLSR WITH DTV CH. 26
KLSR WITH DTV CH. 31

SIXTH REPORT

Analysis of: 34N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	425152	11584.8
not affected by terrain losses	379599	8791.6
lost to NTSC IX	120	8.0
lost to additional IX by ATV	563	32.0
lost to all IX	683	40.0

Analysis of: 26A OR EUGENE
HAAT 259.0 m, ATV ERP 83.9 kW, direction 0.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	425152	11584.8
not affected by terrain losses	392692	9219.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	7202	304.1
lost to ATV IX only	7202	304.1
lost to all IX	7202	304.1
percent match ATV/NTSC	98.1	96.8

==========

PROPOSED

Analysis of: 34N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	425152	11584.8
not affected by terrain losses	379599	8791.6
lost to NTSC IX	120	8.0
lost to additional IX by ATV	563	32.0
lost to all IX	683	40.0

Analysis of: 31A OR EUGENE
HAAT 259.0 m, ATV ERP 93.4 kW, direction 0.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	425152	11584.8
not affected by terrain losses	387599	9163.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	67	8.0
lost to ATV IX only	67	8.0
lost to all IX	67	8.0
percent match ATV/NTSC	100.0	100.0

FIGURE 6
ANALYSIS OF NTSC/ATV STATIONS
AFFECTED BY CHANNEL 31 DTV PAIRING FOR KLSR

KLSR PAIRED WITH CH. 26 (SIXTH REPORT)

Analysis of: 23N OR COOS BAY

	POPULATION	AREA (sq km)
within Noise Limited Contour	56291	3123.6
not affected by terrain losses	51851	2670.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	133	20.0
lost to all IX	133	20.0

Analysis of: 22A OR COOS BAY
HAAT 190.0 m, ATV ERP 50.0 kW, direction 260.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	56291	3123.6
not affected by terrain losses	56159	3083.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	4.0
lost to ATV IX only	0	4.0
lost to all IX	0	4.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 28N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	371958	10372.6
not affected by terrain losses	332974	7829.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	780	120.1
lost to all IX	780	120.1

Analysis of: 29A OR EUGENE
HAAT 276.0 m, ATV ERP 50.0 kW, direction 0.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	371958	10372.6
not affected by terrain losses	343049	8622.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 26N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	203567	9157.3
not affected by terrain losses	150931	5802.4
lost to NTSC IX	0	8.1
lost to additional IX by ATV	0	0.0
lost to all IX	0	8.1

Analysis of: 27A OR MEDFORD
HAAT 428.0 m, ATV ERP 50.0 kW, direction 300.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	203567	9157.3
not affected by terrain losses	160900	6411.3
lost to NTSC IX	155	4.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	155	4.0
percent match ATV/NTSC	100.0	100.0

KLSR PAIRED WITH CH. 31 (PROPOSED)

Analysis of: 23N OR COOS BAY

	POPULATION	AREA (sq km)
within Noise Limited Contour	56291	3123.6
not affected by terrain losses	51851	2670.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	133	20.0
lost to all IX	133	20.0

Analysis of: 22A OR COOS BAY
HAAT 190.0 m, ATV ERP 50.0 kW, direction 260.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	56291	3123.6
not affected by terrain losses	56159	3083.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	4.0
lost to ATV IX only	0	4.0
lost to all IX	0	4.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 28N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	371958	10372.6
not affected by terrain losses	332974	7829.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	780	120.1
lost to all IX	780	120.1

Analysis of: 29A OR EUGENE
HAAT 276.0 m, ATV ERP 50.0 kW, direction 0.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	371958	10372.6
not affected by terrain losses	343049	8622.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 26N OR MEDFORD

	POPULATION	AREA (sq km)
within Noise Limited Contour	203567	9157.3
not affected by terrain losses	150931	5802.4
lost to NTSC IX	0	8.1
lost to additional IX by ATV	0	0.0
lost to all IX	0	8.1

Analysis of: 27A OR MEDFORD
HAAT 428.0 m, ATV ERP 50.0 kW, direction 300.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	203567	9157.3
not affected by terrain losses	160900	6411.3
lost to NTSC IX	155	4.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	155	4.0
percent match ATV/NTSC	100.0	100.0

FIGURE 6 (CONT'D)

KLSR PAIRED WITH CH. 26 (SIXTH REPORT)

Analysis of: 22N OR SALEM

	POPULATION	AREA (sq km)
within Noise Limited Contour	1906829	20912.7
not affected by terrain losses	1807714	17660.7
lost to NTSC IX	402526	865.3
lost to additional IX by ATV	0	0.0
lost to all IX	402526	865.3

Analysis of: 20A OR SALEM
HAAT 363.0 m, ATV ERP 52.3 kW, direction 270.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	1906829	20912.7
not affected by terrain losses	1878870	18393.2
lost to NTSC IX	50578	221.4
lost to additional IX by ATV	16	8.0
lost to ATV IX only	16537	100.6
lost to all IX	50594	229.4
percent match ATV/NTSC	100.0	100.0

Analysis of: 13N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	549683	25974.3
lost to NTSC IX	30436	893.5
lost to additional IX by ATV	0	0.0
lost to all IX	30436	893.5

Analysis of: 25A OR EUGENE
HAAT 451.0 m, ATV ERP 602.7 kW, direction 0.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	663365	27945.6
lost to NTSC IX	0	4.0
lost to additional IX by ATV	298	52.1
lost to ATV IX only	298	52.1
lost to all IX	298	56.1
percent match ATV/NTSC	100.0	99.9

Analysis of: 31N OR KLAMATH FALLS

	POPULATION	AREA (sq km)
within Noise Limited Contour	55289	5882.6
not affected by terrain losses	54267	4554.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 29A OR KLAMATH FALLS
HAAT 691.0 m, ATV ERP 50.0 kW, direction 353.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	55289	5882.6
not affected by terrain losses	55123	5478.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

KLSR PAIRED WITH CH. 31 (PROPOSED)

Analysis of: 22N OR SALEM

	POPULATION	AREA (sq km)
within Noise Limited Contour	1906829	20912.7
not affected by terrain losses	1807714	17660.7
lost to NTSC IX	402526	865.3
lost to additional IX by ATV	0	0.0
lost to all IX	402526	865.3

Analysis of: 20A OR SALEM
HAAT 363.0 m, ATV ERP 52.3 kW, direction 270.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	1906829	20912.7
not affected by terrain losses	1878870	18393.2
lost to NTSC IX	50578	221.4
lost to additional IX by ATV	16	8.0
lost to ATV IX only	16537	100.6
lost to all IX	50594	229.4
percent match ATV/NTSC	100.0	100.0

Analysis of: 13N OR EUGENE

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	549683	25974.3
lost to NTSC IX	30436	893.5
lost to additional IX by ATV	0	0.0
lost to all IX	30436	893.5

Analysis of: 25A OR EUGENE
HAAT 451.0 m, ATV ERP 602.7 kW, direction 0.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	772281	36367.3
not affected by terrain losses	663365	27945.6
lost to NTSC IX	0	4.0
lost to additional IX by ATV	298	52.1
lost to ATV IX only	298	52.1
lost to all IX	298	56.1
percent match ATV/NTSC	100.0	99.9

Analysis of: 31N OR KLAMATH FALLS

	POPULATION	AREA (sq km)
within Noise Limited Contour	55289	5882.6
not affected by terrain losses	54267	4554.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 29A OR KLAMATH FALLS
HAAT 691.0 m, ATV ERP 50.0 kW, direction 353.0 degrees T,

	POPULATION	AREA (sq km)
within Noise Limited Contour	55289	5882.6
not affected by terrain losses	55123	5478.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

FIGURE 6 (CONT'D)

KLSR PAIRED WITH CH. 26 (SIXTH REPORT)

Analysis of: 32N OR SALEM

	POPULATION	AREA (sq km)
within Noise Limited Contour	1958893	29504.3
not affected by terrain losses	1897347	23258.5
lost to NTSC IX	70590	189.4
lost to additional IX by ATV	22325	88.6
lost to all IX	92915	278.0

Analysis of: 33A OR SALEM
HAAT 544.0 m, ATV ERP 245.8 kW, direction 260.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1958893	29504.3
not affected by terrain losses	1923080	24394.8
lost to NTSC IX	478	80.6
lost to additional IX by ATV	207	16.1
lost to ATV IX only	207	16.1
lost to all IX	685	96.7
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 31N WA RICHLAND

	POPULATION	AREA (sq km)
within Noise Limited Contour	161850	7058.6
not affected by terrain losses	157995	6482.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 30A WA RICHLAND
HAAT 370.0 m, ATV ERP 50.0 kW, direction 20.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	161850	7058.6
not affected by terrain losses	161593	6994.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 7N OR CORVALLIS

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1031912	25050.1
lost to NTSC IX	183436	1352.4
lost to additional IX by ATV	0	0.0
lost to all IX	183436	1352.4

Analysis of: 39A OR CORVALLIS
HAAT 375.0 m, ATV ERP 1000.0 kW, Cap Adj 1.3 dB 270.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1078464	25130.3
lost to NTSC IX	6	8.0
lost to additional IX by ATV	111698	240.8
lost to ATV IX only	111698	240.8
lost to all IX	111704	248.8
percent match ATV/NTSC	99.6	97.8

KLSR PAIRED WITH CH. 31 (PROPOSED)

Analysis of: 32N OR SALEM

	POPULATION	AREA (sq km)
within Noise Limited Contour	1958893	29504.3
not affected by terrain losses	1897347	23258.5
lost to NTSC IX	70590	189.4
lost to additional IX by ATV	22325	88.6
lost to all IX	92915	278.0

Analysis of: 33A OR SALEM
HAAT 544.0 m, ATV ERP 245.8 kW, direction 260.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1958893	29504.3
not affected by terrain losses	1923080	24394.8
lost to NTSC IX	478	80.6
lost to additional IX by ATV	207	16.1
lost to ATV IX only	207	16.1
lost to all IX	685	96.7
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 31N WA RICHLAND

	POPULATION	AREA (sq km)
within Noise Limited Contour	161850	7058.6
not affected by terrain losses	157995	6482.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 30A WA RICHLAND
HAAT 370.0 m, ATV ERP 50.0 kW, direction 20.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	161850	7058.6
not affected by terrain losses	161593	6994.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

==========

Analysis of: 7N OR CORVALLIS

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1031912	25050.1
lost to NTSC IX	183436	1352.4
lost to additional IX by ATV	0	0.0
lost to all IX	183436	1352.4

Analysis of: 39A OR CORVALLIS
HAAT 375.0 m, ATV ERP 1000.0 kW, Cap Adj 1.3 dB 270.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1347029	31398.9
not affected by terrain losses	1078464	25130.3
lost to NTSC IX	6	8.0
lost to additional IX by ATV	111698	240.8
lost to ATV IX only	111698	240.8
lost to all IX	111704	248.8
percent match ATV/NTSC	99.6	97.8